

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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RAMONA A. MANUS,  Plaintiff, v.  SAGE HOSPITALITY RESOURCES, LLC  Defendant.	Case No. 08 CV 01037  The Honorable Joan H. Lefkow  Magistrate Judge Arlander Keys  <b>Jury Trial Demanded</b>
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**MOTION FOR LEAVE TO APPEAR AND FOR  
ADDITIONAL TIME TO AMEND PLAINTIFF'S COMPLAINT**

Plaintiff Ramona A. Manus moves for leave for her counsel to appear and for additional time to amend her complaint. In support of her motion, Plaintiff states:

**Request for Leave to Appear**

- 1) Plaintiff retained J. Bryan Wood of The Law Office of J. Bryan Wood as her counsel in this matter on March 26, 2008.
- 2) Plaintiff respectfully requests leave for her counsel to appear on her behalf. A copy of Plaintiff's counsel's appearance form is attached as Exhibit A.

**Request for Additional Time to Amend Plaintiff's Complaint**

- 3) Plaintiff respectfully requests thirty (30) days (until April 30, 2008) to amend her complaint by, among other things, including the information requested in the Court's March 11, 2008 Order.
- 4) Specifically, in amending her complaint, Plaintiff will attach a copy of her EEOC charge (attached hereto as Exhibit B) and the Notice of Right to Sue she received from the EEOC (attached hereto as Exhibit C).

5) Additionally, Plaintiff will identify the correct name and address of her employer located within the Northern District of Illinois against whom she alleges discrimination. Preliminarily, Plaintiff states that she was employed at the Sheraton Chicago Northwest Hotel, located at 3400 W. Euclid Ave., Arlington Heights, Illinois 60005. The hotel at which Plaintiff worked is owned and operated by Sage Hospitality Resources, LLC (see <http://www.sagehospitality.com/hotels/hotelsStates.htm>). According to the Secretary of State's LLC file detail report, the principal office for Sage Hospitality Resources, LLC is located at 1512 Larimer St., Ste. 800, Denver, Colorado 80202, and the registered service agent in Illinois is C.T. Corporation System, 208 S. LaSalle, Ste. 814, Chicago, Illinois 60604.

6) Plaintiff's counsel did not represent Plaintiff at the EEOC and was only retained recently. Plaintiff's counsel anticipates needing thirty (30) days to investigate the facts and circumstances underlying Plaintiff's claims and to amend her complaint to plead those facts and claims.

**Conclusion**

WHEREFORE, for the reasons stated herein, Plaintiff respectfully requests leave for her counsel to appear and that she be given thirty (30) days (until April 30, 2008) to amend her complaint.

Respectfully submitted,

/s/ J. Bryan Wood

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J. Bryan Wood  
Attorney for Plaintiff

J. Bryan Wood (No. 6270845)  
THE LAW OFFICE OF J. BRYAN WOOD  
53 W. Jackson Blvd., Ste. 660  
Chicago, Illinois 60604  
Telephone: (312) 545-1420  
Facsimile: (312) 577-0749  
Email: [bryan@jbryanwoodlaw.com](mailto:bryan@jbryanwoodlaw.com)

Electronically filed on March 31, 2008

**CERTIFICATE OF SERVICE**

I, J. Bryan Wood, an attorney, certify that service of this Motion for Leave to Appear and for Additional Time to Amend Plaintiff's Complaint on any counsel for Defendant that has appeared by filing with ECF on March 31, 2008.

/s/ J. Bryan Wood

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J. Bryan Wood  
Attorney for Plaintiff